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New York Hotel and Motel Trades Council, AFL-CIO

Barry N. Saltzman
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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

IRINA MORDUKHAYEV,

Plaintiff,

– against –

HILTON TIMES SQUARE, SUNSTONE HOTEL
PROPERTIES INVESTORS, INC., HILTON
HOTELS CORPORATION, FC42 HOTEL LLC,
SUNSTONE 42ND STREET LLC, SUNSTONE 42ND
STREET LESSEE, INC., SUNSTONE HOTEL
PROPERTIES, INC. D/B/A HILTON TIMES
SQUARE, SUNSTONE HOTEL OP, SECURE
WATCH24 D/B/A SW24, SLAVKA KMEE,
FOSTER BURNETT, ROCCO CASTELLANO, AND
NEW YORK HOTEL AND MOTEL TRADES
COUNCIL, AFL-CIO (Union),

Defendants.

Case No. CV-11-615 (ENV)(CLP)

**NOTICE OF MOTION OF THE
NEW YORK HOTEL AND
MOTEL TRADES COUNCIL,
AFL-CIO (UNION) FOR
JUDGMENT ON THE
PLEADINGS PURSUANT
TO Fed. R. Civ. P. 12(c)**

(Served 3/18/11)

PLEASE TAKE NOTICE that, upon the pleadings as attached to the accompanying Certification of Barry N. Saltzman, dated March 18, 2011, the accompanying memorandum of law dated March 18, 2011, and all prior proceedings had heretofore herein, defendant, NEW YORK HOTEL AND MOTEL TRADES COUNCIL, AFL-CIO (“Union”), will move before the Honorable Eric N. Vitaliano, U.S.D.J., at the United States Courthouse, for the Eastern District of New York, 225 Cadman Plaza East, Brooklyn, New York 11201 for judgment on the

pleadings pursuant to Fed. R. Civ. P. 12(c), dismissing plaintiff's claims against the Union in their entirety and with prejudice, and granting such further relief as the Court may deem just and proper. Oral argument will be on a date and time to be designated by the Court.

Dated: New York New York
March 18, 2011

Respectfully submitted,

PITTA & GIBLIN, LLP
Attorneys for Defendant
New York Hotel and Motel Trades Council,
AFL-CIO

By: 

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